Patent Application No. 09/812,438

REMARKS

This Amendment is in response to the Final Office Action dated April 7, 2005. In the Office Action, claims 1-3, 5-7, 11-16 and 17-28 were rejected under 35 USC §102, and claims 4 and 8-10 were rejected under 35 USC §103. By this Amendment, claims 1, 5, 12, 14, 15 and 16 are amended, and claims 17, 19, 21, 23, 26 and 27 are canceled. Currently pending claims 1-16, 18, 20, 22, 24, 25 and 28 are believed allowable, with claims 1, 5 and 11-16 being independent claims.

CLAIM AMENDMENTS:

By this Amendment, claims 1, 5, 12, 14, 15 and 16 are amended to place the claims in better form for appeal. Specifically:

Claim 1 is amended to incorporate the subject matter of previously dependent claim 17 (now canceled);

Claim 5 is amended to incorporate the subject matter of previously dependent claim 19 (now canceled);

Claim 12 is amended to incorporate the subject matter of previously dependent claim 21 (now canceled);

Claim 14 is amended to incorporate the subject matter of previously dependent claim 23 (now canceled);

Claim 15 is amended to incorporate the subject matter of previously dependent claim 26 (now canceled); and

Claim 16 is amended to incorporate the subject matter of previously dependent claim 27 (now canceled).

CLAIM REJECTIONS:

Claims 1-3, 5-7, 11-16 and 17-28 were rejected under 35 USC §102 as anticipated by U.S. Patent No. 5,987,454 to Hobbs et al. (hereinafter "Hobbs"). Final Office Action, page 2. To anticipate a claim under 35 USC §102, a reference must teach every element of the claim. MPEP 2131.

Claim 1

Claim 1 recites, in part, a network system comprising, "a web server for storing a web page that includes a <u>function execution request object</u> which is used to request that a process be performed by

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said function providing server . . . the selection of a <u>function
execution request object</u> that is included in a web page displayed by
said client." Application, claim 1 (emphasis added). Claim 1
continues, "wherein the <u>function execution request object</u> is one of a
button, a banner, a linking keyword, and an image data." Application,
claim 1 (emphasis added).

The Final Office Action states that the function execution request
object is analogous to request headers described in Hobbs. Final
Office Action, page 2. The Applicant respectfully disagrees with the
Examiner's interpretation of Hobbs since, as discussed below, the
request headers discussed in Hobbs are not one of a button, a banner, a
linking keyword, and an image data, selectable or displayed in a
displayed web page.

Hobbs appears to teach a client/server information database record
retrieval system. Hobbs, col. 1, lines 11-15. Hobbs discusses
generating request headers that specify, among other things, the
purpose of the request. Hobbs, col. 14, line 55 - col. 15, line 2,
col. 16, lines 22-27. For example the browser may send a request
header "http://www.example.com/datasite.pl?AR1" to a proxy server.
Hobbs, col. 17, line 64 - col. 18, line 1. Hobbs states,

> The user, by selecting one of said choices, causes said
> application that is executed on said second network resource to
> match a key, corresponding to said one of said choices in a table
> lookup, with a <u>request header</u> comprising: a) a purpose of the
> request; b) a network address for a third network resource to
> which said request header is applied; c) a file name for an
> application that is stored on said third network resource; d) a
> query argument; and e) an authentication argument; and causes said
> application on said second network resource to send said request
> header to said third network resource. Hobbs, col. 8, lines 12-22
> (emphasis added).

Clearly, the request header is issued by an application after a user
selects a choice. *Id.* Hobbs does not teach that a web page includes
the request header, that the request header itself is selectable, or
that the request header is one of a button, a banner, a linking
keyword, and an image data.

The Examiner counters that Hobbs "implements servers to insert a
various types of content such as words, video data, images and
sentences into a web document," citing Figure 5 and col. 15, lines 29-
63 of Hobbs. Final Office Action, page 9.

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In response, the Applicant respectfully submits that even if Hobbs did contain such a teaching, the Examiner has not established that such teaching necessarily establishes that a _request header_ is one of a button, a banner, a linking keyword, and an image data, selectable or displayed in a displayed web page.

The Applicant respectfully submits that an interpretation of Hobbs (as offered by the Final Office Action) that request headers somehow include one of a button, a banner, a linking keyword, and an image data, selectable or displayed in a displayed web page defy the teachings of Hobbs. Hobbs provides a specific example of what a request header looks like (http://www.example.com/datasite.pl?AR1), and states that request headers are generated by an application after a user selection is performed. Hobbs, col. 17, line 64 – col. 18, line 1, col. 8, lines 12-22, and col. 14, lines 55-67.

Thus, it is respectfully submitted that Hobbs does not teach the "function execution request object" claim element of claim 1, and the limitations of "and when said function execution request object included in said web page is selected", "the selection of a function execution request object that is included in a web page displayed by said client" and "wherein the function execution request object is one of a button, a banner, a linking keyword, and an image data" of claim 1.

For at least the reasons set forth above, claim 1 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 1 by the Examiner.

Claim 18

Claim 18 further limits claim 1, reciting, in part, "wherein the execution request object includes _an indicia_ of a first language and a second language and the pertinent process includes a translating process to translate, at least in part, the web page from the first language to the second language." Application, claim 18 (emphasis added).

In rejecting claim 18, the Final Office Action states, "using a gateway is any application program that receives data from a browser or other HTTP server converts it into a form the database can understand." Final Office Action, pages 8-9.

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The Applicant respectfully submits that the above statement fails to point out where Hobbs teaches that execution request object includes <u>an indicia</u> of a first language and a second language. Thus, while the Examiner's statement may be true, it does not establish that Hobbs teaches every element and limitation of claim 18, namely, an indicia of a first language and a second language.

For at least this reason, and the reasons set forth for claim 1, claim 18 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 18 by the Examiner.

<u>Claims 2-4</u>

If an independent claim is nonobvious under 35 USC §103, then any claim depending therefrom is nonobvious. MPEP 2143.03 *citing In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Claims 2-4 are dependent on further limit claim 1. Since claim 1 is believed allowable, claims 2-4 are also believed allowable for at least the same reasons as claim 1.

<u>Claim 5</u>

Claim 5 recites, in part, "in response to the selection of a function execution request object . . . wherein the function execution request object is one of a button, a banner, a linking keyword, and an image data." Application, claim 5. As mentioned above (see discussion of claim 1), Hobbs does not teach a selectable function execution request object that is one of a button, a banner, a linking keyword, and an image data. For at least these reasons, claim 5 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 5 by the Examiner.

<u>Claim 20</u>

Claim 20 further limits claim 5, reciting, in part, "wherein the execution request includes <u>an indicia</u> of a first language and a second language and the predetermined conversion process includes a translating process to translate, at least in part, the web page from the first language to the second language." Application, claim 20 (emphasis added).

In rejecting claim 20, the Final Office Action states, "using a gateway is any application program that receives data from a browser or

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other HTTP server converts it into a form the database can understand."
Final Office Action, pages 8-9.

The Applicant respectfully submits that the above statement fails
to point out where Hobbs teaches that execution request object includes
an indicia of a first language and a second language. Thus, while the
Examiner's statement may be true, it does not establish that Hobbs
teaches every element and limitation of claim 20.

For at least this reason, and the reasons set forth for claim 5,
claim 20 is believed allowable over the cited documents. As such, the
Applicant earnestly solicits allowance of claim 20 by the Examiner.

Claims 6-10

Claims 6-10 are dependent on further limit claim 5. Since claim 5
is believed allowable, claims 6-10 are also believed allowable for at
least the same reasons as claim 5.

Claim 11

Claim 11 recites, in part, a "translating process configured to
translate, at least in part, the web page from a first language to a
second language." Application, claim 11.

The Final Office Action rejects claim 11, citing Hobbs as teaching
"receiving data from a browser or other HTTP server and converting it
into a form the database can understand." Final Office Action, page 5.

Hobbs states, "Corporate intranets are also switching to the HTTP
protocol and will integrate some form of HTIP servers or HTML
conversion 'on the fly' to access their legacy databases." Hobbs, col.
13, lines 49-52. This statement teaches that HTTP-based documents may
be used to retrieve data from a database by servers in real-time. The
Applicant respectfully submits, however, that such an operation does
not amount to a translating process since retrieving data specified in
a document does not equate to translating said document. It is further
submitted that nowhere in Hobbs is there a teaching of translating a
web page from a first language to a second language.

For at least this reason, claim 11 is believed allowable over the
cited documents. As such, the Applicant earnestly solicits allowance
of claim 11 by the Examiner.

Claim 12

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Claim 12 recites, in part, "in response to the selection of said function execution request object." As mentioned above (see discussion of claim 1), Hobbs does not teach a "function execution request object" or "the selection of said function execution request object." For at least these reasons, claim 12 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 12 by the Examiner.

Claim 22

Claim 22 is dependent on further limits claim 12, reciting, "wherein the function providing server is configured to translate, at least in part, the web page from a first language to a second language." Application, claim 22.

The Final Office Action rejects claim 22, citing Hobbs as teaching "using a gateway is any application program that receives data from a browser or other HTTP server converts it into a form the database can understand." Final Office Action, pages 8-9.

The Applicant respectfully submits that such an operation does not amount to a translating process since retrieving data specified in a document does not equate to translating said document. It is further respectfully submitted that nowhere in Hobbs is there a teaching of translating a web page from a first language to a second language.

For at least this reason, and the reasons set forth for claim 12, claim 22 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 22 by the Examiner.

Claim 13

Claim 13 recites, in part, a "translating process configured to translate, at least in part, the web page from a first language to a second language." Application, claim 13.

The Final Office Action rejects claim 13, citing Hobbs as teaching "receiving data from a browser or other HTTP server and converting it into a form the database can understand." Final Office Action, pages 6-7.

Hobbs states, "Corporate intranets are also switching to the HTTP protocol and will integrate some form of HTIP servers or HTML conversion 'on the fly' to access their legacy databases." Hobbs, col. 13, lines 49-52. This statement teaches that HTTP-based documents may

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be used to retrieve data from a database by servers in real-time. The Applicant respectfully submits that such an operation does not amount to a translating process since retrieving data specified in a document does not equate to translating said document. It is further submitted that nowhere in Hobbs is there a teaching of translating a web page from a first language to a second language.

For at least this reason, claim 13 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 13 by the Examiner.

Claim 14

Claim 14 recites, in part, "in response to the selection of a function execution request object . . . wherein the function execution request object is one of a button, a banner, a linking keyword, and an image data." Application, claim 14. As detailed above (see discussion of claim 1), Hobbs does not teach a selectable function execution request object that is one of a button, a banner, a linking keyword, and an image data. For at least these reasons, claim 14 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 14 by the Examiner.

Claim 24

Claim 24 further limits claim 14, reciting, in part, "wherein the execution request object includes _an indicia_ of a first language and a second language and the pertinent process includes a translating process to translate, at least in part, the web page from the first language to the second language." Application, claim 24 (emphasis added).

In rejecting claim 24, the Final Office Action states, "using a gateway is any application program that receives data from a browser or other HTTP server converts it into a form the database can understand." Final Office Action, pages 8-9.

The Applicant respectfully submits that the above statement fails to point out where Hobbs teaches that execution request object includes _an indicia_ of a first language and a second language. Thus, while the Examiner's statement may be true, it does not establish that Hobbs teaches every element and limitation of claim 24.

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For at least this reason, and the reasons set forth for claim 14, claim 24 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 24 by the Examiner.

Claim 15

Claim 15 recites, in part, a "wherein the function providing server is configured to translate, at least in part, the web page from a first language to a second language." Application, claim 15.

As detailed above (see discussion of claim 13), nowhere in Hobbs is there a teaching of translating a web page from a first language to a second language. For at least this reason, claim 15 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 15 by the Examiner.

Claim 25

Claim 25 is dependent on further limits claim 15, reciting, "wherein the function execution request object is one of a button, a banner, a linking keyword, and an image data." Application, claim 25. As detailed above (see discussion of claim 1), Hobbs does not teach a selectable function execution request object that is one of a button, a banner, a linking keyword, and an image data. For at least these reasons, and the reasons set forth for claim 15, claim 25 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 25 by the Examiner.

Claim 16

Claim 16 recites, in part, "wherein the function execution request object is one of a button, a banner, a linking keyword, and an image data." Application, claim 16. As detailed above (see discussion of claim 1), Hobbs does not teach a selectable function execution request object that is one of a button, a banner, a linking keyword, and an image data. For at least these reasons, claim 16 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 16 by the Examiner.

Claim 28

Claim 28 is dependent on further limits claim 18, reciting, "wherein the function providing server is configured to translate, at least in part, the web page from a first language to a second language." Application, claim 28.

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The Final Office Action rejects claim 28, citing Hobbs as teaching "using a gateway is any application program that receives data from a browser or other HTTP server converts it into a form the database can understand." Final Office Action, pages 8-9.

The Applicant respectfully submits that such an operation does not amount to a translating process since retrieving data specified in a document does not equate to translating said document. It is therefore respectfully submitted that nowhere in Hobbs is there a teaching of translating a web page from a first language to a second language.

For at least this reason, and the reasons set forth for claim 18, claim 28 is believed allowable over the cited documents. As such, the Applicant earnestly solicits allowance of claim 28 by the Examiner.

CONCLUSION

In view of the forgoing remarks, it is respectfully submitted that this case is now in condition for allowance and such action is respectfully requested. If any points remain at issue that the Examiner feels could best be resolved by a telephone interview, the Examiner is urged to contact the attorney below.

No fee is believed due with this Amendment, however, should a fee be required please charge Deposit Account 50-0510. Should any extensions of time be required, please consider this a petition thereof and charge Deposit Account 50-0510 the required fee.

Respectfully submitted,

Dated: July 7, 2005

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